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Licensed in Missouri and Virginia.
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May 28, 2015

Federal Maritime Commission
Secretary of the Commission
800 N. Capitol Street, N.W.
Washington, D.C. 20573-0001

Re: ***Respondent's Consent Motion for Extension of Time to File Responsive Pleadings***

Dear Secretary of the Commission:

Please find enclosed an original signed copy and six copies of Respondent's Consent Motion for Extension of Time to File Responsive Pleadings to be filed in *Combustion Store Limited v. UniGroup*, Docket No. 15-02. Please return one file stamped copy via courier.

Please do not hesitate to contact me with any questions.

Very truly yours,

Thompson Coburn LLP

By

A handwritten signature in cursive script, appearing to read 'Deona T. DeClue'.

Deona T. DeClue

DTD/jrj

Enclosures

Before the Federal Maritime Commission

COMBUSTION STORE LIMITED,)	
)	
Complainant,)	
)	
v.)	Docket No. 15-02
)	
UNIGROUP WORLDWIDE – UTS,)	
)	
Respondent.)	

**RESPONDENT'S CONSENT MOTION FOR
EXTENSION OF TIME TO FILE RESPONSIVE PLEADINGS**

Pursuant to Rules 69 and 102 of the Commission's Rules of Practice and Procedure, 46 C.F.R. §§ 502.69, 502.102, respondent, UniGroup Worldwide - UTS ("UniGroup"), by and through undersigned counsel, respectfully requests the grant of an additional twenty-one (21) days, until June 19, 2015, within which to file responsive pleadings, and in support states as follows:

1. That Respondent's responsive pleading is currently due on May 29, 2015.
2. Undersigned counsel were engaged and instructed by UniGroup within the past four business days and require additional time to review allegations of the complaint and underlying documentation concerning the disputed shipment.
3. Jonathan Benner is scheduled to be overseas on other business from May 28, 2015 until June 6, 2015.

4. Undersigned counsel have conferred with counsel for Complainant, Combustion Store Limited. Complainant's counsel have authorized UniGroup to state that they do not object to the requested extension.

Counsel for UniGroup therefor respectfully moves the presiding Administrative Law Judge to grant an additional twenty-one (21) days up to and including Friday, June 19, 2015, in which to file its answer or other dispositive motion. The grant of such an extension under these circumstances is consistent with prior Commission precedent and procedures and will promote the administration of justice and the efficient disposition of this case. *See Great White Fleet, Ltd. V. Southeastern Paper Prods. Export, Inc.*, 26 SRR 1374 [ALJ, 1994]; *Puerto Rico Freight Sys., Inc. v. R & S Trading and J.C. Trading*, 27 SRR 141 [ALJ, 1995].

Respectfully submitted,

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By: 

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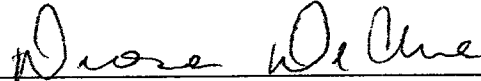
Attorneys for Respondent,

UniGroup Worldwide - UTS

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon counsel for Complainant (Sean C. Griffin and Richard D. Gluck) via electronic mail and by mailing a copy via the US Postal Service.

Dated at, 4:00pm this 28th day of May, 2015.

A handwritten signature in cursive script, appearing to read "Deona DeClue", is written over a horizontal line.

Deona DeClue

For Respondent,

UniGroup Worldwide - UTS